

TOGUT, SEGAL & SEGAL LLP  
One Penn Plaza, Suite 3335  
New York, New York 10119  
(212) 594-5000  
Kyle J. Ortiz  
Frank A. Oswald  
Brian Shaughnessy  
Amanda C. Glaubach

*Proposed Counsel to the Debtors  
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

JPA NO. 111 CO., LTD. and  
JPA NO. 49 CO., LTD.,

Debtors.<sup>1</sup>

Chapter 11

Case No.: 21-12075 (DSJ)

(Jointly Administered)

**AGENDA FOR HEARING FOR MATTERS SCHEDULED  
TO BE HEARD ON JANUARY 26, 2022 AT 10:00 AM  
(VIA ZOOM FOR GOVERNMENT)**

**Time and Date of Hearing:** January 26, 2022 at 10:00 a.m.  
(prevailing Eastern Time)

**Location of Hearing:** Judge David S. Jones, Courtroom 501  
United States Bankruptcy Court,  
Southern District of New York  
One Bowling Green  
New York, NY 10004

**Hearing Attendance  
Instructions:** The Hearing will be conducted Via Zoom for  
Government. Those wishing to appear before the  
Bankruptcy Court at the Omnibus Hearing must register  
their appearance by utilizing the Electronic Appearance  
portal located at the Bankruptcy Court's website:  
[https://ecf.nysb.uscourts.gov/cgi-  
bin/nysbAppearances.pl](https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl). Appearances must be entered  
no later than **January 25, 2022 at 4:00 p.m.** (Prevailing  
Eastern Time). In addition, Gen. Ord. M-543, along with  
other temporary procedures implemented by the

---

<sup>1</sup> The Debtors in these Chapter 11 cases are: JPA No. 111 Co., Ltd. and JPA No. 49 Co., Ltd. The Debtors' corporate address is Kasumigaseki Common Gate West Tower, 3-2-1 Kasumigaseki, Chiyoda-Ku, Tokyo 100-0013.

Bankruptcy Court in connection with the COVID-19 pandemic (including electronic filing procedures for *pro se* parties) can be found by visiting [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (the “Bankruptcy Court’s Website”) and clicking on the “Coronavirus COVID-19 Protocol” banner.

**Copies of Motions:** Copies of each of the related pleadings can be viewed and/or obtained by: (i) accessing the Bankruptcy Court’s Website for a fee, or (ii) contacting the Office of the Clerk of the United States Bankruptcy Court, Southern District of New York. Please note that a PACER password is required to access documents on the Bankruptcy Court’s Website.

**I. CONTESTED MATTERS:**

1. *Motion Filed by FitzWalter Capital Partners (Financial Trading) to Dismiss or Abstain from Hearing these Chapter 11 Cases* [Docket No. 22].

Objection Deadline: January 13, 2022 at 4:00 PM

Responses/Replies:

- (a) *Statement of Sumitomo Mitsui Trust Bank, Limited, Regarding the Bidding Procedures Motion and the Dismissal Motion* [Docket No. 51].
- (b) *Debtors’ Objection to the Motion of FitzWalter Capital Partners (Financial Trading) Limited to Dismiss or Abstain from Hearing these Chapter 11 Cases* [Docket No. 53].
- (c) *Objection to Motion (Joinder) filed by on behalf of Mizuho Leasing Co., Ltd.* [Docket No. 54].
- (d) *Response of JP Lease Product & Services Co. (A) Objecting to Motion of FitzWalter Capital Partners (Financial Trading) Limited to Dismiss or Abstain from Hearing these Chapter 11 Cases* [ECF No. 22] and (B) *Supporting the Debtors Motion to Approve Bidding Procedures* [Docket No. 55].
- (e) *Reply to Motion to Dismiss filed on behalf of FitzWalter Capital Partners (Financial Trading).* [Docket No. 67].
- (f) *Reply to Motion to Dismiss filed on behalf of FitzWalter Capital Partners (Financial Trading).* [Docket No. 69].

Related Documents:

- (a) *Declaration of Andrew Gray in Support of Motion to Dismiss or Abstain from Hearing These Chapter 11 Cases* [Docket No 23].
- (b) *Certificate of Service* [Related to Docket No. 22] [Docket No. 24].
- (c) *Notice of Hearing on Motion to Dismiss or Abstain from Hearing These Chapter 11 Cases* [Docket No, 31].
- (d) *Notice of Rescheduled Time for Matters Scheduled to be Heard on January 20, 2022* [Docket No. 35].
- (e) *Affidavit of Service of Debtors' Objection to the Motion of FitzWalter Capital Partners (Financial Trading) Limited to Dismiss or Abstain from Hearing these Chapter 11 Cases* [Related to Docket No. 22] [Docket No. 64].
- (f) *Notice of Change of Hearing Date and Time for Matters Scheduled to be Heard on January 20, 2022* [Docket No. 70].
- (g) *Certificate of Service* [Related to Docket No. 67 and 69] [Docket No. 71].
- (h) *Certificate of Service* [Related to Docket No. 67 and 69] [Docket No. 72].
- (i) *Supplemental Declaration of Heinrich Loechteken in Support of Debtors' (I) Objection to the Motion of FitzWalter Capital Partners (Financial Trading) Limited to Dismiss or Abstain from Hearing these Chapter 11 Cases and (II) Application for Entry of Orders, Inter Alia, Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets* [Docket No. 78].
- (j) *Declaration of Akhil Shah in Support of FWCP's Motion to Dismiss and Preliminary Objection to Debtors Application for Entry of Orders* [Docket No. 79].
- (k) *Declaration of Andrew Gray Supplemental to Prior Declaration in Support of Creditor FitzWalter Capital Partners Motion to Dismiss or Abstain from Hearing These Chapter 11 Cases; And Objection To Debtors Application for Entry of Orders, Inter Alia, Approving Bidding Procedures* [Docket No. 80].
- (l) *Affidavit of Service* [Related to Docket Nos. 77 and 78] [Docket No. 84].

Status: This matter is going forward.

2. *Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (B) Establishing Stalking Horse Bidders and Bid Protections; (C) Approving Procedures of the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (D) Authorizing Enforcement Actions; (E) Scheduling an Auction and a Sale Hearing; and (F) Approving the Form and Manner of Notice thereof; and (II)(A) Approving the Sale of the Purchased Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances; and (B) Granting Related Relief [Docket No. 21].*

Objection Deadline: January 13, 2022 at 4:00 PM

Responses/Replies:

- (a) *Statement of Sumitomo Mitsui Trust Bank, Limited, Regarding the Bidding Procedures Motion and the Dismissal Motion [Docket No. 51].*
- (b) *Response of JP Lease Product & Services Co. (A) Objecting to Motion of FitzWalter Capital Partners (Financial Trading) Limited to Dismiss or Abstain from Hearing these Chapter 11 Cases [ECF No. 22] and (B) Supporting the Debtors Motion to Approve Bidding Procedures [Docket No. 55].*
- (c) *Preliminary Objection of FitzWalter Capital Partners (Financial Trading) Limited to Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (B) Establishing Stalking Horse Bidders and Bid Protections et al., [Docket No. 56].*
- (d) *Debtors' Reply to the Objection of FitzWalter in Further Support of Their Application for Entry of Orders, Inter Alia, Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets [Docket No. 68].*

Related Documents:

- (a) *Affidavit of Service of Notice of Hearing and Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets et al., [Docket No. 25].*
- (b) *Affidavit of Service of Notice of Hearing and Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets et al., [Docket No. 26]*

- (c) *Notice of Rescheduled Time for Matters Scheduled to be Heard on January 20, 2022* [Docket No. 35].
- (d) *Declaration of Heinrich Loechteken in Support of Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets et al.*, [Docket No. 44].
- (e) *Affidavit of Service of Declaration of Heinrich Loechteken in Support of Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (B) Establishing Stalking Horse Bidders and Bid Protections et al.*, [Docket No. 46].
- (f) *Affidavit of Service of Declaration of Heinrich Loechteken in Support of Debtors' Application for Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets; (B) Establishing Stalking Horse Bidders and Bid Protections et al.*, [Docket No. 47].
- (g) *Declaration of Benjamin Finestone in Support of Preliminary Objection to Debtors' Application for Entry of Orders* [Docket No. 57].
- (h) *Notice of Filing of Exhibits to the Debtors' Application for Entry of Orders et al.*, [Docket No. 58].
- (i) *Affidavit of Service of Notice of Filing of Exhibits* [Docket No. 66].
- (j) *Notice of Filing of Revised Exhibits to the Debtors' Application for Entry of Orders et al.*, [Docket No. 77].
- (k) *Supplemental Declaration of Heinrich Loechteken in Support of Debtors' (I) Objection to the Motion of FitzWalter Capital Partners (Financial Trading) Limited to Dismiss or Abstain from Hearing these Chapter 11 Cases and (II) Application for Entry of Orders, Inter Alia, Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets* [Docket No. 78].
- (l) *Declaration of Akhil Shah in Support of FWCP's Motion to Dismiss and Preliminary Objection to Debtors Application for Entry of Orders* [Docket No. 79].
- (m) *Declaration of Andrew Gray Supplemental to Prior Declaration in Support of Creditor FitzWalter Capital Partners Motion to Dismiss or Abstain from Hearing These Chapter 11 Cases; and Objection to Debtors Application for Entry of Orders, Inter Alia, Approving Bidding Procedures* [Docket No. 80].

- (m) *Affidavit of Service of Debtors' Reply to the Objection of FitzWalter in Further Support of their Application for Entry of Orders, Inter Alia, Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets* [Docket No. 82].
- (n) *Affidavit of Service of Debtors' Reply to the Objection of FitzWalter in Further Support of their Application for Entry of Orders, Inter Alia, Approving Bidding Procedures Relating to the Sale of Substantially All of the Debtors' Assets* [Docket No. 83].
- (o) *Affidavit of Service* [Related to Docket Nos. 77 and 78] [Docket No. 84].

Status: This matter is going forward.

Dated: New York, New York  
January 25, 2022

JPA NO. 111 CO., LTD. and  
JPA No. 49 CO., LTD.  
*Debtors and Debtors in Possession*  
By their Proposed Counsel  
TOGUT, SEGAL & SEGAL LLP  
By:

/s/Kyle J. Ortiz

Kyle J. Ortiz  
Frank A. Oswald  
Brian Shaugnessy  
Amanda C. Glaubach  
One Penn Plaza, Suite 3335  
New York, New York 10119  
Telephone: (212) 594-5000